



February 6, 2006

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Re: Alpheus Communications, L.P., Certification of CPNI Filing (2-6-06)
WC Docket No. 06-36, EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission rules concerning telecommunications carriers protection of the privacy of customer proprietary network information ("CPNI"),² Alpheus Communications, L.P. (the "Company" or "Alpheus") submits this Compliance Statement and Certificate. The Company is primarily a wholesale carrier's carrier and serves only a limited number of end users directly. While providing wholesale services to other carriers, Alpheus has knowledge of end user CPNI only insofar as it has information that it uses to bill its carrier customers. Nevertheless, protecting even this limited end user CPNI, and the CPNI of our carrier customers, is important to Alpheus and the Company has adopted various operational procedures to assure that, consistent with the Commission's rules, all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

Nonetheless, in light of the media reports, Alpheus is reviewing those procedures and is currently implementing a more comprehensive plan for protecting its customers' confidential information to expand its protections against inadvertent external release and to assure complete compliance as to its own internal uses of the information. As part of this comprehensive plan, Alpheus is issuing updated notices to its customers providing them additional opportunities to grant or deny Alpheus approval to use their CPNI.

As requested by the Public Notice, the undersigned, as an officer of Alpheus, certifies based upon personal knowledge that the following Compliance Statement describes the

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

² 47 C.F.R. § 64.2001, *et seq.*

operational procedures and policies implemented by Alpheus to protect the privacy of its customers' CPNI in compliance with Commission's CPNI rules.

The Company is a competitive telecommunications carrier providing services in Texas. The Company provides high capacity telecommunications services on a wholesale basis to other telecommunications carriers and on a retail basis to enterprise customers. These services include various forms of transport services, managed bandwidth, private line services, Ethernet, dedicated high capacity special access transport services and collocation ancillary to these services.

Currently, Alpheus primarily provides dedicated local transport service and intercity transport services to its customers, and does not provide wireless service. As permitted by the CPNI rules, the Company uses CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) for the purpose of providing carrier premises equipment ("CPE") and protocol conversion; and (5) in order to provision inside wiring, maintenance and repair services. Further, the Company also uses CPNI, as permitted under the rules, in the context of marketing its services within the same categories of service that Alpheus already provides to the customer.

Alpheus does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for any reason. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties is strictly prohibited by the Company as set forth in Alpheus' policies and the Company has no plans to ever share this information with unrelated third parties.

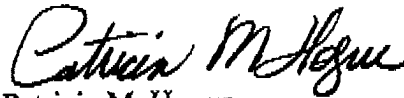
All Company employees are required to abide by the Company's Employee Handbook, which requires employees to maintain the confidentiality of all information, including confidential customer information, that is obtained as result of their employment by the Company. Employees who violate the Company's Employee Handbook will be subject to discipline, up to and including termination. Although the Company has never received any complaint from a customer that it has misused confidential information, including CPNI, in any fashion, in an abundance of caution and in light of the recent reports about other carriers that have released sensitive, personal subscriber information to third parties, the Company has audited its training and discipline policies and procedures relating to the use of customer confidential information by Company employees. All employees with access to CPNI have received training that details Alpheus' policy for protecting the privacy of customer's confidential information. In the event the Company determines that Company employees require more training in order to protect CPNI, the Company will update its training processes and other procedures as necessary.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns using CPNI. Alpheus' very limited print and media advertising is typically focused on trade press or the entire customer base. The Company does not conduct targeted marketing campaigns using CPNI. Rather, the Company has a five person sales force that is primarily involved in relationship marketing, including considerable effort selling in face to face

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meetings. Should Alpheus' shift its marketing efforts to include targeted marketing using CPNI, Alpheus will ensure that such information is used consistent with the Commission's rules.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patricia M. Hogue". The signature is fluid and cursive, with the first name "Patricia" being more prominent than the last name "Hogue".

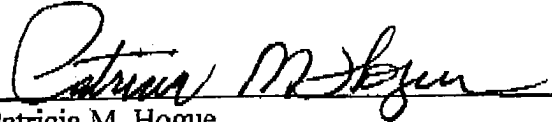
Patricia M. Hogue,

Senior Vice President, Regulatory Affairs
Alpheus Communications, L.P.

cc: Bryon McCoy
Best Copy and Printing

Certificate

I, Patricia M. Hogue, state that I am Senior Vice President, Regulatory Affairs, on behalf of Alpheus Communications, L.P.; that I am authorized to submit the foregoing Certificate and Compliance Statement on behalf of Alpheus Communications, L.P.; and that it is true and correct to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Patricia M. Hogue", written over a horizontal line.

Name: Patricia M. Hogue

Title: Senior Vice President, Regulatory Affairs
Alpheus Communications, L.P.